



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 25, 2022

BY CM/ECF

The Hon. Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Enald Beqiraj, a/k/a "Aldo Beqiraj," 21 Cr. 656 (LGS)*

Dear Judge Schofield:

The Government writes to request a 45-day adjournment of the pretrial conference in the above-referenced matter currently scheduled for June 27, 2022, at 10:30 a.m. The Government also seeks an exclusion of time under the Speedy Trial Act until the date of the next conference. Defense counsel consents to these applications.

On March 24, 2021, the Government obtained a Complaint charging the defendant with two counts of wire fraud, in violation of [18 U.S.C. §§ 1343](#) and [2](#). On March 29, 2021, the defendant was arrested at his residence in Salem, Massachusetts. He was presented the next day and released subject to pretrial bail conditions. On April 20, 2021, the defendant as presented in this District and permitted to remain on release subject to the same conditions. On October 27, 2021, the defendant agreed to the filing of an Information and pleaded not guilty.

The parties have had ongoing, detailed discussions about mitigation and about appropriate pretrial resolutions to this matter. The parties believe they have reached an agreement in principle, and the Government relayed a plea agreement to the defense today. A 45-day adjournment will permit defense counsel to review the agreement with their client and allow for the parties to schedule a date for a plea proceeding.

The Government further requests, with the consent of defense counsel, an order excluding time under the Speedy Trial Act from June 27, 2022, until the date of the next conference in this matter. The ends of justice are served by excluding time because it will permit the parties additional time to complete their discussions regarding a pretrial resolution. *See* [18 U.S.C. § 3161\(h\)\(7\)\(A\)](#).

Defense counsel consents to the adjournment of the pretrial conference and the exclusion of time under the Speedy Trial Act.

Respectfully submitted,

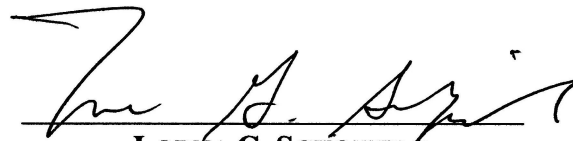
DAMIAN WILLIAMS
United States Attorney
Southern District of New York

/s/
Kedar S. Bhatia
Assistant United States Attorney
(212) 637-2465

Cc: Counsel for the defendant (by CM/ECF)

Application Granted. The change of plea hearing is referred to the magistrate judge on duty. The parties shall promptly schedule a plea date and email the executed plea agreement or *Pimentel* letter to Chambers. The status conference currently scheduled for June 27, 2022, is adjourned to **September 6, 2022, at 10:45 a.m.** For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and September 6, 2022, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h) (7)(A). It is hereby ORDERED that the time between today and September 6, 2022, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 40.

Dated: June 27, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE